designed for and normally used by carriers for that purpose." Id. This conclusion does not follow, for three reasons.

First, the SCPSC's conclusion assumes that the interconnection agreements themselves comply with sections 251 and 252, and that there are no obstacles to entry other than compliance with those agreements. That assumption is incorrect. The SCPSC resolved many disputed arbitration issues incorrectly, and accordingly AT&T has filed a complaint challenging unlawful aspects of its BellSouth interconnection agreement in federal district court. See AT&T Carroll Aff. ¶ 18.

Second, for the reasons set forth at length not only in AT&T's Comments but in the Department's Evaluation and numerous other comments, the conditions for entry in South Carolina are particularly inhospitable.[20] It is therefore not surprising that initial efforts to compete with BellSouth have arisen in other states, and in those states, numerous complaints have been filed against BellSouth.[21]

Third, the presence or absence of such complaints should not distract from the fundamental point that the arbitration and section 271 investigation processes are, in most states, important avenues for CLECs to raise concerns about checklist noncompliance. It has been

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[20] See, e.g., DOJ Evaluation at 33-44; Consumer Advocate Comments at 4-5, 7; AT&T Comments at 19-23; 38-48; 64-66 & Carroll Aff. & McNeely Aff.; MCI Comments at 7-9, 38-44, 80; Sprint Comments at 18-27, 36-40; ACSI Comments at 16-26; 52-53; CompTel Comments at 9-13.

[21] For example, AT&T has filed a motion with the Florida PSC to compel BellSouth's compliance with its obligation to provide usage and billing data for unbundled elements. See FPSC Staff Mem. at 109. In addition, Sprint has filed a complaint with the Florida PSC over BellSouth's failure to provision unbundled loops, and ACSI has filed similar complaints with both the Georgia PSC and with this Commission. See supra page 7.

AT&T's experience that these proceedings can play a helpful role in compelling BOCs to acknowledge and at least begin to implement their checklist duties.

In South Carolina, however, little has been accomplished in those proceedings. The reason for this can be seen in the SCPSC's discussion of four examples of why it believes CLEC concerns are not genuine:

> First, the SCPSC chastises AT&T for raising a concern that BellSouth's prices are not cost-based when claiming mysteriously that the issue has been "already decided." The SCPSC fails to acknowledge, however, that the decision occurred in an arbitration proceeding in which no cost methodology was adopted and in which the setting of cost-based rates was explicitly deferred to a subsequent proceeding. SCPSC Comments at 12.
>
> Second, the SCPSC accuses Sprint of having raised concerns about provisioning problems in Florida that were premised on standards of "operational perfection" that no carrier could meet, and that were insignificant because no complaint was filed. Id. In reality, not only did Sprint file such a complaint (see Appendix to Sprint Comments), but the standards that CLECs expect BellSouth to meet, and that the Act requires, are those demanded by the principle of nondiscrimination, which South Carolina, unlike other states in BellSouth's region, has made no effort to ascertain or establish.
>
> Third, in rejecting AT&T's suggestion that BellSouth's limited trunk provisioning was not nearly sufficient to demonstrate compliance with its obligation to provide nondiscriminatory access to all the required UNEs, the SCPSC considers BellSouth to be blameless because it cannot "force other carriers to place orders." SCPSC Comments at 13. The SCPSC, however, simply ignored numerous CLECs' complaints, not only of frustration with BellSouth's inability to provide the tools essential to placing orders for UNEs (such as functioning OSS and details on UNE combinations), but of BellSouth's repeated failure to complete the orders that CLECs did submit.
>
> Fourth, the SCPSC's final example -- rejecting AT&T's complaints about BellSouth's LENS interface -- is equally unsubstantiated and ignores this Commission's detailed guidelines (see supra Part I.B).

At bottom, the SCPSC's comments concerning checklist compliance depend on facts and assumptions that are incorrect, and fail to respond to or even address many of basic aspects of

BellSouth's checklist noncompliance. In the face of overwhelming contrary evidence, not only from CLECs but from the state Consumer Advocate, from other state commissions and staffs, and from the Department of Justice, it is plain that BellSouth's application fails to demonstrate compliance with the checklist.

II. BELLSOUTH MAY NOT PROCEED UNDER TRACK B

Given the extensive evidence of BellSouth's pervasive checklist noncompliance, and given the importance of checklist compliance to the development of meaningful local competition, the Commission should reject BellSouth's application on the basis of checklist noncompliance alone. The Commission therefore need not reach the "highly fact-specific" inquiry whether BellSouth has received one or more qualifying requests for purposes of foreclosing entry pursuant to Track B or has otherwise satisfied Track A. See SBC Oklahoma Order ¶ 60.[22] Nevertheless, should the Commission reach these issues, the comments make plain that BellSouth has not yet met the requirements of either Track A or Track B.

No commenter contends that residential and business customers in South Carolina today have a choice among two or more facilities-based providers of local exchange service. DOJ Evaluation at 12. Thus, BellSouth fails to satisfy the "competing-provider" requirement of Track A. Id. The remaining question, therefore, is whether, for purposes of invoking Track

[22] In the Matter of Application by SBC Communications Inc. Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-region, InterLATA Services in Oklahoma, CC Docket No. 97-121, Memorandum Report and Order, FCC 97-228 (rel. June 26, 1997) ("SBC Oklahoma Order").

B, BellSouth has shown that no CLEC has taken reasonable steps to become an exclusively or predominantly facilities-based carrier to business and residential customers in South Carolina.

1. The Department of Justice reaches no final conclusion on this issue, but recommends that the Commission assess the reasonableness of various competitors' entry plans in light of information to be provided in reply comments. DOJ Evaluation at 9 n.14, 11-12. With respect to AT&T, the Department expresses concern that AT&T has not "clearly indicat[ed] whether its service would be predominantly facilities-based," and seeks clarification "whether and when" AT&T would seek to provide such service. Id. at 9 n.14.

As AT&T stated in its Comments, AT&T sought from the outset of its negotiations with BellSouth to obtain the ability to serve business and residential customers with a combination of BellSouth's network elements. AT&T Comments at 50-51 & Carroll Aff. ¶¶ 5-7, 12-19. Indeed, AT&T believes that resale is not a viable long term strategy for serving most residential and business customers, and -- if unbundled network elements were truly available on nondiscriminatory terms and conditions and were priced at cost as the Act requires -- AT&T would rely upon unbundled network elements, in conjunction with its own facilities, to serve at least the majority of its residential and business customers. Thus, as AT&T stated in its Comments, its plan is "to provide 'the type of telephone exchange service described in section 271(c)(1)(A)'" (AT&T Comments at 51-52, quoting SBC Oklahoma Order ¶ 60), that is, service that this Commission would deem to be predominantly facilities-based to both residential and business customers.

AT&T is not in a position to state when it will provide such UNE-based service in South Carolina, in part because, as the Department itself recognizes, there is "great uncertainty"

concerning whether and when BellSouth will make unbundled network elements available to AT&T at cost-based rates. DOJ Evaluation at 40-41. As the Department further explains, "it is not surprising that there is no real competition [in South Carolina] using unbundled network elements now, or that competitors' plans to compete in the future are subject to many contingencies." DOJ Evaluation at 40-41; This uncertainty is further compounded by the fact that today, more than 16 months after AT&T first specially requested that BellSouth make it possible for AT&T to enter BellSouth's markets using combinations of network elements, BellSouth still has not provided AT&T with adequate information on how to gain access to such combinations, and has refused to pursue or complete related development work that is essential to the use of unbundled network elements.[23]

In short, in South Carolina, it is BellSouth's own resistance to UNE-based entry that precludes competitors from developing concrete timetables for UNE-based competitive entry. The absence of such timetables ought not serve to validate Track B entry, for that would simply reward BellSouth for its noncompliance. So long as competitors seeking to serve customers via unbundled network elements are taking reasonable steps to compel the BOC to make those elements available on reasonable, nondiscriminatory, and cost-based terms and conditions, their requests for access and interconnection should be deemed "qualifying requests" for purposes of foreclosing Track B. See Consumer Advocate Comments at 4 ("The AT&T arbitration noted

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[23] See, e.g., DOJ Evaluation at 16-25; AT&T Comments at 9-23. Indeed, AT&T's need for more certainty is not unique. As the South Carolina Consumer Advocate observes, "[t]here is nothing unusual about other companies waiting for AT&T to resolve large and complex issues such as these, and to benefit from its negotiation and/or litigation of the issues," in order to break the "logjam" and bring competition "closer to reality." Consumer Advocate Comments at 5.

above is an example of a competitor taking steps to provide facilities-based local competition"). Because AT&T has consistently taken, and continues to take, such steps (see AT&T Carroll Aff. ¶¶ 19-36), Track B is not available to BellSouth.

2. None of the other comments supporting Track B entry for BellSouth has merit. The SCPSC contends that BellSouth's application may proceed under Track B because "none of BellSouth's potential competitors are taking any reasonable steps toward implementing any business plan for facilities based local service to business and residential customers in South Carolina." SCPSC Comments at 5. The SCPSC bases this view on AT&T's lack of "specific plans" for facilities-based service, Sprint's lack of testimony as to "specific steps" for South Carolina entry, ACSI's "business decision to allocate its resources elsewhere," and the SCPSC's lack of information regarding the plans of ITC Deltacom and Time Warner. Id. at 5-6.

The SCPSC's assessment is entitled to little weight, however, because it addresses the wrong question and is incomplete. As the Department of Justice notes, the SCPSC nowhere acknowledges that "competitors which used unbundled network elements obtained from BellSouth" would be "using their 'own' facilities" for purposes of section 271. DOJ Evaluation at 11 n.20; see AT&T Comments at 52 & n.21. Instead, the SCPSC focuses in its comments, as it did in its Compliance Order, exclusively on testimony concerning the construction of new network facilities for interconnection with BellSouth's network.[24]

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[24] See SCPSC Comments at 5-6; SCPSC Compliance Order at 18-19; Petition of AT&T Communications of the Southern States, Inc., for Arbitration with BellSouth Telecommunications, Inc., Pursuant to the Telecommunications Act of 1996, S.C. PSC Docket No. 96-358-C, Hearing No. 9585, Vol. 4, at 89-91 (Feb. 4, 1997) (Testimony of W.J. Carroll).

The relevant question, which the SCPSC does not address, is whether AT&T (or others) have taken reasonable steps to obtain the conditions for UNE-based entry that would enable AT&T to satisfy the standards for being considered a facilities-based competitor for purposes of Track A. As noted above, AT&T has clearly and consistently taken those steps.

Finally, Ameritech argues that the absence of implementation schedules in BellSouth's interconnection agreements should be deemed sufficient, without more, to enable BellSouth to pursue a Track B application. Ameritech Comments at 4-8. In Ameritech's view, because a CLEC's failure to comply "within a reasonable period of time" with an "implementation schedule" is grounds for invoking Track B (see § 271(c)(1)(B)(i)), the absence of any implementation schedule should be considered the equivalent of a failure to comply with an actual, agreed-to schedule. This argument has no merit.

First, contrary to Ameritech's claim, the absence of an implementation schedule is not equivalent to unreasonable noncompliance with an existing schedule.[25] As the South Carolina Consumer Advocate points out, the lack of implementation schedules in BellSouth's agreements is attributable to the conduct and decisions of BellSouth and the SCPSC. Consumer Advocate Comments at 3. The reality is that few, if any, BOCs sought implementation schedules in their interconnection agreements -- despite their ability to so under § 252(c)(3) -- for the simple

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[25] In addition, quite apart from the fundamental difference between the absence of an implementation schedule and the failure to comply with one, the practical consequences of Ameritech's argument independently require its rejection. Because there are few, if any, BOC interconnection agreements that contain such schedules, Ameritech's argument would immediately render every BOC eligible for Track B. That, in turn, would destroy the BOCs' incentive that Track A provides to promote the emergence of operational facilities-based competitors in each of its local markets, and eliminate the ability of Track A to serve its role as the primary path to interLATA entry that Congress intended it to be. See SBC Oklahoma Order ¶¶ 41-42, 46, 52. For this reason as well, Ameritech's argument should be rejected.

reason that such schedules necessarily would impose obligations not only on the CLECs to receive checklist items but upon the BOCs to provide them. BellSouth, like other BOCs, was unwilling in negotiations to commit to any such timetables.

Conversely, the statutory standard, with its express directive to examine CLEC compliance with an existing schedule within a "reasonable" period of time is directed at delay in entry that is exclusively the CLECs' fault. The statute expressly limits the invocation of Track B to situations where CLEC noncompliance is unreasonable and thus, for example, not due to misconduct or foot-dragging on the part of the BOC.

The absence of an implementation schedule is thus a symptom of the very failure of BOCs to comply with their checklist obligations that precludes section 271 relief in the first place. Far from advancing a BOC's cause for interLATA relief, it is further evidence that the BOC has not yet been willing to commit to provide and abide by the essential preconditions of competitive local entry. It certainly is not evidence of a unilateral failure on the CLECs' part to comply with its obligations under the agreement, and therefore cannot be deemed sufficient in itself to support invocation of Track B.

III. BELLSOUTH'S UNLAWFUL MARKETING PRACTICES MERIT REJECTION OF BELLSOUTH'S APPLICATION FOR FAILURE TO SHOW COMPLIANCE WITH SECTION 272

None of the commenters supporting BellSouth's application defends or even addresses the serious infirmities in BellSouth's unsupported assertions of compliance with the requirements of section 272. For example, as several commenters noted, BellSouth failed to provide meaningful information about the numerous transactions to date between BellSouth and its long

distance affiliate, and what little information it did provide in some cases raised significant concerns of favoritism. See AT&T Comments at 53-59; MCI Comments at 69-76; Sprint Comments at 43-44; TRA Comments at 33-34; Vanguard Comments at 17-18. BellSouth has thus failed to provide the Commission with any reasonable basis for concluding that BellSouth has complied or will comply with section 272.

Ameritech does urge the Commission, however, to reverse its conclusion in the Ameritech Michigan Order (¶ 376) that a BOC would violate the equal access requirements of section 251(g) if, when receiving a call for new customer service, the BOC identifies only its section 272 affiliate's long distance service absent an affirmative request for the names of other IXCs. Ameritech Comments at 11-15.[26] There is no basis for the Commission to reverse this conclusion, however, because, as it held in the Ameritech Michigan Order, such marketing practices during calls for new service would give the BOC's § 272 affiliates "an unfair advantage over other [IXCs]," and are barred by existing equal access obligations. Ameritech Michigan Order ¶ 376.

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[26] The marketing script presented in the Ameritech Michigan proceeding provided as follows:

> You have a choice of companies, including Ameritech Long Distance, for long distance service. Would you like me to read from a list of other available long distance companies or do you know which company you would like?

Ameritech Michigan Order ¶ 375. Similarly, BellSouth in this proceeding has identified the following marketing script as acceptable for inbound calls:

> You have many companies to choose from to provide your long distance service. I can read from a list the companies available for selection, however, I'd like to recommend BellSouth Long Distance.

Varner Aff. ¶ 230.

Ever since the MFJ, this Commission has relied on equal access and informed customer choice to foster competition, barring BOCs from favoring one IXC over another. In particular, the equal access requirements oblige a BOC to inform new local exchange customers of their right to select the IXC of their choice, and, when identifying the available IXCs in the service area, the BOC must randomly list these IXCs, so that one is not favored over another.[27] Section 251(g) of the Act makes clear that these "equal access . . . restrictions and obligations" continue to apply to BOCs "until such restrictions and obligations are explicitly superseded by regulations prescribed by the Commission." Because these equal access requirements have not been "explicitly superseded by regulations," they apply with full force today.

Given § 251(g)'s express continuation of the equal access obligations, the scope of a BOC's authority, under § 272(g), to market interLATA service provided by its § 272 affiliate must be read so as not to breach these requirements. Thus, as the Commission rightly held in the Ameritech Michigan Order, a BOC cannot claim authority under § 272(g) to identify only its own interLATA affiliate when new customers call to begin service. As the Commission has concluded, such conduct "is inconsistent on its face with [the] requirement that a BOC must provide the names of interexchange carriers in random order." Ameritech Michigan Order ¶ 376. Accord Application of Pacific Bell Communications for a Certificate of Public

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[27] The Commission long ago directed that "LEC personnel taking [a] verbal order should provide new customers with the names and, if requested, the telephone numbers of the IXCs and should devise procedures to ensure that the names of IXCs are provided in random order." Investigation of Access and Divestiture Related Tariffs, CC Docket No. 83-1145, 101 FCC 2d 935, 950 (1985); see also United States v. Western Elec. Co., Inc., 578 F.Supp. 668, 677 (D.D.C. 1983) (holding that, when receiving calls for new service and advising customers of their choices of IXCs, BOCs may show "no favoritism" to any particular IXC).

Convenience and Necessity to Provide InterLATA, IntraLATA and Local Exchange Telecommunications Service Within the State of California, Calif. PUC, A.96-03-007 (May 5, 1997) ("The equal access requirement is an empty formalism if Pacific Bell can satisfy it by simply referring to 'many choices,' and then describing its affiliate's long distance service in detail.")

Neither Ameritech nor BellSouth has even attempted to explain how their proposed marketing scripts for requests for new service can be squared with these existing equal access requirements. Instead, they make a facial attack on the equal access requirements themselves, arguing that the requirement that they identify IXCs in random order is no longer needed, is "excessively burdensome," and will undermine their marketing efforts. Ameritech Comments at 14-15; BellSouth Br. at 64. These claims, however, rely on blatant mischaracterizations of the current equal access requirements. For example, Ameritech claims that it will be forced to recite a random list of "in excess of 100 available carriers." Ameritech Comments at 15. But under the equal access requirements, it is common practice for BOCs, if they so choose, to read a truncated randomized list of a limited number of IXCs, rather than requiring that the entire list be read every time.[28] Ameritech and BellSouth also falsely assert that they will be forced to read a list of IXCs even when the customer already expresses a preference for a particular IXC. Ameritech Comments at 14; BellSouth Br. at 64. Again, however, the equal access rules require no such thing: if the customer requests service from a particular IXC, there is no

[28] Other methods used by BOCs to comply with equal access requirements include directing a customer to call an 800 number to listen to a recorded message listing IXCs or having their customer service representative start reading down a list of names, stopping when the customer expresses a preference.

requirement that a BOC go on to read a list of IXCs. All that § 251(g) requires of Ameritech and BellSouth is that they continue to follow the equal access requirements under which they have operated for over a decade. These requirements are a measured, appropriate means of protecting against BOCs abusing their monopoly in the local market to gain an unfair advantage in the long distance market.

Ameritech and BellSouth claim that the Non-Accounting Safeguards Order[29] implicitly eliminated the equal access requirement that bars them from identifying only their own affiliate's long distance services on inbound calls for new service. This claim not only misreads the Non-Accounting Safeguards Order, but ignores the requirement under § 251(g), that the equal access requirements will continue in effect until "explicitly superseded by regulations prescribed by the Commission."

The Non-Accounting Safeguards Order made plain that the equal access requirements remain in effect, concluding that "BOCs must provide any customer who orders new local exchange service with the names . . . of all of the carriers offering interexchange service in its service area," and "[a]s part of this requirement, a BOC must ensure that the names of the interexchange carriers are provided in random order." Non-Accounting Safeguards Order ¶ 292. Ameritech and BellSouth rely on the Commission's later statement that a BOC "may market its affiliate's interLATA services to inbound callers, provided that the BOC also informs such customers of their right to select the interLATA carrier of their choice." Id. This statement,

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[29] Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended, CC Docket No. 96-149, First Report and Order and Further Notice of Proposed Rulemaking (rel. Dec. 24, 1996) ("Non-Accounting Safeguards Order").

coming immediately after the Commission reaffirmed the BOC's equal access obligations quoted above, plainly was not intended to eliminate these obligations.

Nor can such an intent be implied, as Ameritech and BellSouth assert (Ameritech Comments at 14; BellSouth Br. at 63), from the Commission's citation of an ex parte submission from NYNEX. This bare citation, without more, cannot properly be read to approve any particular marketing practice, and plainly did not overturn existing equal access requirements. Moreover, the interpretation offered by Ameritech and BellSouth -- that the Commission impliedly amended part of the equal access requirements through this citation -- is expressly barred by the Act, which requires that all existing equal access requirements will remain in effect until the Commission "explicitly supersedes" these requirements "by regulations."

IV. THE COMMENTS CONFIRM THAT BELLSOUTH'S ENTRY WOULD NOT BE IN THE PUBLIC INTEREST

Finally, the commenters overwhelmingly agree that BellSouth's entry would not now be in the public interest.[30] Apart from a few terse endorsements of BellSouth's application, the SCPSC and Ameritech present arguments on the public interest issue, which the other comments convincingly refute.[31]

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[30] DOJ Evaluation at 32-50; AT&T Comments at 59-81; MCI Comments at 77-99; WorldCom Comments at 22-27; Sprint Comments at 45-64; ACSI Comments at 51-58; ALTS Comments at 26-36; Intermedia Comments at 46-48; TRA Comments at 35-47; Consumer Advocate Comments at 7-9; Vanguard Comments at 18-26.

[31] In addition, an ad hoc coalition of manufacturers and telecommunications managers states -- without taking a position on the checklist or section 272 issues -- that the Commission is precluded from considering, with the respect to the public interest, any issues other than the impact of granting BellSouth's application on competition in interLATA service and

(continued...)

First, the SCPSC and Ameritech argue that it is necessary to grant BellSouth's application in order to stimulate local competition. In their view, the "carrot" of section 271 relief is no longer needed to induce checklist compliance. SCPSC Comments at 15. Instead, it is the long distance companies, who are standing "on the sidelines" in an effort to "protect[] their own turf" from BOC competition (Ameritech Comments at 2), that need the incentive of competition from BOC offerings of "bundled packages of local and long distance services" to "compel[]" them to enter the South Carolina market. SCPSC Comments at 14.

This view is untenable because it assumes, erroneously, that BellSouth has in fact done all it reasonably can to open its local markets to competition. In reality, BellSouth is not "presently willing and able to provide at cost-based rates what competitors require for entry." DOJ Evaluation at 50. As a result, "regardless of the incentives a provider may have to enter local markets, if it does not have adequate opportunity to enter then entry will not occur." Id. See also Consumer Advocate Comments at 5 ("the current lack of local competition" is not because CLECs are unwilling to enter, but because "the process in South Carolina has gotten out of order, and needs to be put back on a more logical track"). Thus, to ensure that many

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[31] (...continued)
manufacturing markets. Ad Hoc Coalition of Telecommunications Manufacturing Cos. et al. Comments at 1-35. This Commission has already rejected that argument, see Ameritech Michigan Order ¶ 386, and should do so again here. E.g., AT&T Comments at 60-61, 72-73. The coalition's only new argument in support of its flawed position -- that the Commission is bound by positions it took in MFJ-related proceedings (Comments at 35-40) -- has no merit. Quite apart from whether the comments fairly characterize the Commission's prior positions, the Act itself -- with its unprecedented ambition of opening local telephone exchange markets to competition and using the incentive of interLATA authorization to do so, and its requirement that the Commission give substantial weight to the Department's views -- is a new circumstance that amply supports the Commission's assessment of the public interest.

carriers are able to compete in offering consumers bundled packages of local and long distance services, it is essential that BellSouth's application not be granted until local markets are "fully and irreversibly opened" to competition. DOJ Evaluation at 2.

Second, the SCPSC echoes (at 14-15) BellSouth's assertion that granting BellSouth's application would produce significant consumer benefits. This claim is convincingly refuted by numerous other commenters, who adjudged it "significantly overvalue[d]" (DOJ Evaluation at 48); "speculative" (Consumer Advocate Comments at 8); and "counterintuitive" (Sprint Comments at 55). As the Justice Department explains, BellSouth's claims of public benefit "rest on unconvincing analytical and empirical assumptions" and largely ignore the "substantial" competitive benefits from requiring that BellSouth's "local markets be opened before allowing interLATA entry." DOJ Evaluation at 48-49; see Schwartz Supp. Aff. ¶¶ 60-84. Because "the benefits from opening the BOCs' local markets to competition . . . are likely to substantially exceed the benefits to be gained from more rapid BOC participation in long distance markets" (DOJ Evaluation at 49), and because BellSouth's cooperation will be essential to opening its markets (id.), granting BellSouth's application is not in the public interest.

CONCLUSION

For the reasons stated above and in AT&T's initial comments, BellSouth's section 271 application for South Carolina should be denied.

Respectfully submitted,

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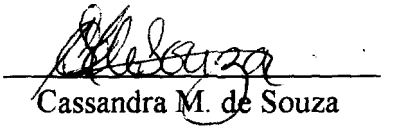
November 14, 1997

CERTIFICATE OF SERVICE

I, Cassandra M. de Souza, do hereby certify that I caused a copy of the foregoing Reply Comments of AT&T in Opposition to BellSouth's Section 271 Application for South Carolina to be served by first class mail this 14th day of November, 1997, on all parties on the attached service list.



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